

**REMARKS**

Claims 1-23 are pending in the application.

Claims 1-23 have been rejected.

Claims 1, 6, 8, 11, 15, 18, 20, 22 and 23 have been amended. No new matter has been added. Support for these claim amendments can be found, at least in part, in ¶¶ [0020], [0021], [0025], [0028]-[0038] and Figures 1-3 of the originally-filed Application.

Applicants would also like to thank Examiner Thompson for the Interview conducted on April 29, 2010. Applicants believe the amendments and discussions below to be in accord with the discussions presented at the Interview.

**Objection to the Specification**

The specification is objected to for purportedly failing to provide proper antecedent basis for the claimed subject matter. Applicants respectfully traverse this objection.

The terminology used in the claims for describing the different formats (i.e., a source format, a common format, and a target format) and for describing the different applications (i.e., a source application and a target application) are encompassed within the subject matter of the specification. For example, support for these terms can be found at ¶¶ [0035]-[0038] of the originally-filed Application. Therefore, Applicants respectfully request the reconsideration and withdrawal of the objection to the specification.

*Rejection of Claims under 35 U.S.C. §112*

Claims 1-23 stand rejected under 35 U.S.C. §112, first paragraph, as purportedly failing to comply with the written description requirement. Applicants respectfully traverse this rejection.

As described above, the terminology used in Claims 1-23 to describe the different formats and different applications can be found within the originally-filed Application, for example, at ¶¶ [0035]-[0038]. In addition, ¶¶ [0031]-[0032] of the originally-filed Application provide support for storing data in a source format and a common format at an integration server. Therefore, Applicants respectfully request the reconsideration and withdrawal of the rejection to these claims.

Claims 1-7, 11-14, 18-19 and 22 stand rejected under 35 U.S.C. §112, second paragraph, as purportedly being indefinite. Applicants offer amendments and respectfully traverse this rejection.

*Rejection of Claims under 35 U.S.C. § 102(e)*

Claims 1-6, 8-13 and 15-23 stand rejected under 35 U.S.C. § 102(b) as purportedly being anticipated by International Publication No. WO 01/43031 listing Chin as the inventor (“Chin”). Applicants respectfully traverse this rejection.

Claim 1, as amended, is representative of independent Claims 8, 11, 15, 18, 20, 22 and 23 and recites as follows:

1. A computer-implemented method comprising:  
defining an opportunity data model, wherein  
the defining is performed at an integration server,  
the opportunity data model represents an opportunity as data elements,  
the defining comprises  
determining a set of relationships between the opportunity and a  
plurality of entities related to the opportunity, and  
the opportunity data model represents the set of relationships as  
attributes of the opportunity;  
receiving data in a source format, wherein  
the data in the source format is received from a source application, and  
the source application is configured to use the source format; and  
transforming the data in the source format into data in a common format, wherein  
the transforming is performed by the integration server,  
the common format is a format used by the integration server,  
the opportunity data model defines the common format,  
the common format is configured to facilitate transforming data in the  
source format into data in the common format,  
the common format is configured to facilitate transforming data in the  
common format into data in a target format, and  
the data in the common format and the data in the source format are stored  
at the integration server.

The Office Action relies on Chin to disclose the elements of Claim 1. *See* Office Action, p. 4. Applicants respectfully submit that Chin fails to show, teach, or even suggest the elements of Claim 1.

In particular, the cited sections of Chin fail to show, teach, or even suggest transforming data received in a source format into data in a common format, particularly where the common format is configured to facilitate transforming data in the source format into data in the common format and where the common format is also configured to facilitate transforming data in the common format into data in a target format. The

cited sections of Chin purportedly provide a system in which agents assist sponsors in fulfilling one or more project needs via the Internet. *See* Chin, p. 4, ll. 4-6. The cited sections of Chin purportedly provide that sponsors contact a referral system to enter information regarding a project, via a project manager module, where information describing the project is stored and managed. *See* Chin, p. 9, ll. 5-9. The Office Action attempts to equate Chin's disclosure of a sponsor providing project information to a referral system and the project manager module managing such information with the claimed transformation of data received in a source format into data in a common format. *See* Office Action, p. 5. Among other failings of this position, Chin's disclosure of a sponsor providing project information and a project manager module storing and managing such information fails to teach or suggest the claimed transformation.

Claim 1 provides that data is received from a source application in a source format and is transformed into a common format. It is this common format that facilitates the transformation of data from a source format into the common format and thereafter from the common format into a target format. By contrast, the cited sections of Chin fail to teach or suggest such functionality. Instead, the cited sections of Chin simply provide that project information provided by a sponsor is stored and managed by the referral system and later provided to other agents via the Internet. Even if Chin's project information were somehow comparable to the claimed data (a point Applicants do not concede), the cited sections of Chin still fail to teach or suggest any operation even remotely comparable to the claimed transformation of data from a source format into a common format, particularly where the common format is configured to facilitate transforming data in a source format into data in the common format and where the

common format is also configured to facilitate transforming data in the common format into data in a target format. Thus, even if Chin could somehow be successfully characterized as teaching the claimed data and the claimed transformations (points Applicants obviously do not concede), the cited sections of Chin would still fail to teach or suggest anything even remotely comparable to the claimed common format, particularly where this common format is both configured to facilitate transforming data from a source format into a common format and configured to facilitate transforming from the common format into a target format. Therefore, the cited sections of Chin fail to show, teach, or even suggest the claimed transformation.

For at least these reasons, Applicants respectfully submit that Chin fails to show, teach, or even suggest all the limitations of Claims 1, 8, 11, 15, 18, 20, 22 and 23, and all claims depending therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

It will also be noted that Claim 6, as amended, reads as follows:

6. The computer-implemented method of claim 5 further comprising:  
transforming the data in the common format into data in the target format,  
wherein  
a target application is configured to use the target format, and  
the target format represents the data as another opportunity data model;  
and  
sending the data in the target format to the target application.

The Office Action relies on Chin to disclose the elements of Claim 6. *See* Office Action, p. 8. Applicants respectfully submit that Chin fails to show, teach, or even suggest the limitations of Claim 6.

First, the cited sections of Chin fail to show, teach, or even suggest transforming data in a common format into data in a target format. The cited sections of Chin provide that once project information is provided by a sponsor, such information is stored and managed by a referral system. *See* Chin, p. 7, l. 17-24. The cited sections of Chin further provide that an information escrow manager within the referral system uses rules, preferences, and permissions to disclose the project information to various recipients. *See* Chin, p. 12, l. 19-21. The Office Action asserts that Chin's disclosure of the information escrow manager using rules, preferences, and permissions to disclose certain information to recipients discloses the transformation of data in the common format into data in a target format. *See* Office Action, 8. However, Chin's act of filtering information by running rules, preferences, and permissions for recipients revolves around the question of access and not the format of Chin's project information. By marked contrast, the claimed invention transforms the data in question from a source format into a common format and from the common format into a target format. Controlling access to information is in no way comparable to transforming the format of data. In fact, and by no means suggesting any parallels between Chin's information and the claimed data, access to information can be cleansed without any alteration to the information's format. Conversely, data can be transformed from one format to another without any change whatsoever to access to that data. Quite clearly Chin's access control is simply not equivalent to the claimed transformation of data in a common format into data in a target format.

In addition, the cited sections of Chin provide that a sponsor and recipients are able to interact with the referral system via the Internet. *See* Chin, p. 5, l. 8-11. Given

this, the cited sections of Chin fail to teach or suggest a second transformation of data from a common format into a target format. Hence, the cited sections of Chin fail to show, teach, or even suggest transforming data in a common format into data in a target format of a target application.

Furthermore, the cited sections of Chin fail to show, teach, or even suggest sending data in a target format to a target application. As described above, the cited sections of Chin fail to teach or suggest a second transformation of data from a common format into a target format. As such, the cited sections of Chin cannot be relied upon to disclose sending data in a target format to a target application.

For at least these reasons, Applicants respectfully submit that Chin fails to show, teach, or even suggest the limitations of Claim 6, and this claim is in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to Claim 6 and an indication of the allowability of same.

*Rejection of Claims under 35 U.S.C. § 103(a)*

Claims 7 and 14 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over Chin. Applicants respectfully traverse this rejection.

For at least the reason that Claims 7 and 14 are dependent upon allowable base Claims 1 and 11, Applicants respectfully submit that the rejection of Claims 7 and 14 under 35 U.S.C. § 103(a) is overcome.

Furthermore, (without commenting on its propriety in doing so), Applicants respectfully note the fact that the Office Action must rely on skill in the art at the time of the invention, in order to extrapolate Chin in this regard. Obviously, Chin's lack of

teaching with regard to the data belies Chin's ability to teach the common format defined thereby. Applicants therefore respectfully request the reconsideration and withdrawal of the rejection to these claims.

### **CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5094.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,



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